

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

JUDY JIEN, et al.,

Plaintiffs,

v.

PERDUE FARMS, INC., et al.,

Defendants.

C.A. No. 1:19-CV-2521-SAG

**JOINT STIPULATION AND
[PROPOSED] ORDER AMENDING
INTERIM SCHEDULING ORDER**

The Plaintiffs and Defendants in the above-captioned matter (collectively, the “Parties”), by and through their undersigned counsel and pursuant to Local Rule 105.9, on this 9th day of December 2021, recite and stipulate as follows:

WHEREAS, on November 12, 2021, the Court approved the Parties’ stipulation amending the Interim Scheduling Order in the above-captioned matter, *see* ECF Nos. 535, 536;

WHEREAS, under the revised Interim Scheduling Order, the deadline for the Parties to submit a joint letter brief to the Court regarding areas of dispute on (1) search terms, (2) Defendants’ objections to Plaintiffs’ Rule 34 requests for structured data, other than Defendants’ objections to the relevant time period for those requests, and (3) objections to interrogatories, is December 10, 2021, *see* ECF Nos. 535, 536;

WHEREAS, the Parties have had productive dialogue on these issues;

WHEREAS, on November 22, 2021, Plaintiffs sought Defendants’ consent to file a Third Amended Consolidated Complaint in this matter;

WHEREAS, the Parties have agreed that Plaintiffs will provide Defendants with a copy of the proposed Third Amended Consolidated Complaint, including a redline version showing the proposed changes to the operative complaint, no later than December 10, 2021;

WHEREAS, the Parties have agreed that, if Defendants do not consent to Plaintiffs’ filing of a Third Amended Consolidated Complaint, Plaintiffs will file a motion for leave to file a Third Amended Consolidated Complaint by December 17, 2021;

WHEREAS, the Parties have agreed that Defendants will file any opposition to a motion for leave to file a Third Amended Consolidated Complaint by January 10, 2022;

WHEREAS, the Parties have agreed that, if the Defendants file any opposition to a motion for leave to file a Third Amended Consolidated Complaint, Plaintiffs will file any reply by January 28, 2022;

WHEREAS, the Parties have agreed that, in light of the proposed Third Amended Consolidated Complaint and its potential effects on the Parties' negotiations over discovery, the deadline (absent further extension) for the Parties to submit a joint letter brief to the Court regarding areas of dispute on (1) search terms, (2) Defendants' objections to Plaintiffs' Rule 34 requests for structured data, other than Defendants' objections to the relevant time period for those requests, and (3) objections to interrogatories should be extended from December 10, 2021 to January 21, 2022;

THE PARTIES STIPULATE AND AGREE that (1) no later than December 10, 2021, Plaintiffs will provide Defendants with a copy of the proposed Third Amended Consolidated Complaint, including a redline version showing the proposed changes to the operative complaint; (2) unless Defendants consent to Plaintiffs' filing of a Third Amended Consolidated Complaint, Plaintiffs will file a motion for leave to file a Third Amended Consolidated Complaint no later than December 17, 2021; (3) Defendants will file any opposition to a motion for leave to file a Third Amended Consolidated Complaint no later than January 10, 2022; (4) Plaintiffs will file any reply to any opposition to a motion for leave to file a Third Amended Consolidated Complaint no later than January 28, 2022; and (5) absent further extension the Parties will submit a joint letter brief to the Court regarding areas of dispute on (i) search terms, (ii) Defendants' objections to Plaintiffs' Rule 34 requests for structured data, other than Defendants' objections to the relevant time period for those requests, and (iii) objection to interrogatories, no later than January 21, 2022.

Dated: December 9, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice to counsel for all parties that have appeared in this case.

/s/ Brent W. Johnson

IT IS SO ORDERED.

DATED: _____

United States District Judge Stephanie A. Gallagher